

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
At Greeneville

RALPH ROBINSON,	:	
	:	
Plaintiff,	:	NO. 2:12-cv-30
	:	
v.	:	Collier/Carter
	:	
HOSTO & BUCHAN, PLLC,	:	Jury Demand
	:	
Defendant.	:	

**MOTION FOR STAY OF PROCEEDINGS TO ENFORCE JUDGMENT AND TO
APPROVE SUPERSEDEAS BOND**

Defendant, Hosto & Buchan, PLLC (“Defendant”), by and through its attorneys, Grant, Konvalinka & Harrison, P.C., and pursuant to Rule 62 of the *Federal Rules of Civil Procedure*, respectfully moves the Court for an Order staying proceedings to enforce any judgment against Defendant arising by reason of the Judgment in a Civil Action [Document 114]. In support of its Motion, Defendant would show that it has filed a Notice of Appeal. The judgment entered was for One Thousand Dollars (\$1,000.00) and Plaintiff will not be prejudiced by the Court’s grant of a stay in the event the judgment becomes final after an appeal by Defendant is completed. Defendant is entitled to a stay of enforcement of the judgment under *Fed. R. Civ. P.* 62 and requests that the Court enter an Order staying action by Plaintiff to enforce the judgment pending finality of same.

In addition, Defendant requests that the Court approve a cash *supersedeas* bond in the amount of One Thousand Dollars (\$1,000.00) to be deposited with the District Court promptly

upon approval of the bond. Defendant requests a temporary stay of enforcement until a ruling on this motion and for a period of ten (10) days following entry of any Order granting the requested stay and setting the bond, with a continuing stay thereafter when Defendant posts said bond.

Respectfully submitted,

GRANT KONVALINKA & HARRISON, P.C.

By: s/ J. Scott McDearman
J. Scott McDearman, BPR No. 12174
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CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2014, a copy of this pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

GRANT KONVALINKA & HARRISON, P.C.

By: s/ J. Scott McDearman
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